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Attorneys for Defendant,
 Counterclaimant and Third-Party Plaintiff
 NATIONAL FIRE & MARINE INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PN II, INC. dba PULTE HOMES and/or
 DEL WEBB, a Nevada corporation,

Plaintiff,

v.

NATIONAL FIRE & MARINE INSURANCE
 COMPANY; and DOES 1 through 100,
 inclusive,

Defendants.

Case No. 2:20-cv-01383-ART-BNW

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND EXPERT
 DISCLOSURE DATE**

(Second Request)

Complaint filed: July 24, 2020
 Trial Date: Not set

1 NATIONAL FIRE & MARINE INSURANCE
2 COMPANY, a Nebraska insurance
company,

3 Counter-Claimant,
4 v.

5 PN II, INC. dba PULTE HOMES and/or
6 DEL WEBB, a Nevada corporation,

7 Counter-Defendant.

8 NATIONAL FIRE & MARINE INSURANCE
9 COMPANY, a Nebraska insurance
company,

10 Third-Party Plaintiff,

11 v.

12 PN II, dba PULTE HOMES and/or DEL
13 WEBB, a Nevada corporation;
14 CONTRACTORS INSURANCE
COMPANY OF NORTH AMERICA, INC.,
a Hawaii corporation,

15 Third-Party Defendants.

17 **TO THE HONORABLE COURT, AND TO ALL PARTIES AND THEIR**
18 **ATTORNEYS OF RECORD:**

19 Defendant/Counter-Claimant/Third-Party Plaintiff National Fire & Marine
20 Insurance Company ("National Fire"), Plaintiffs/Counter-Defendants PN II, Inc. dba Pulte
21 Homes and Del Webb (Collectively "Pulte"), and Third-Party Defendant Contractors
22 Insurance Company of North America ("CICNA"), by and through their respective
23 counsel of record, hereby STIPULATE and agree, subject to this Court's approval, to
24 extend and continue the expert reporting date from December 16, 2022 to January 6,
25 2023. This is the second request for an extension specific to extend the initial expert
26 disclosure date.

27 The parties continue to pursue discovery diligently and require additional time for
28 the initial expert disclosure based on the court's recent continuation of the pending

1 motions pursuant to ECF No. 79. The parties agreed to continue the current expert
 2 reporting date by nine (9) days following the December 28, 2022 hearings (ECF No. 79),
 3 to January 6, 2023, in order to follow the December 28, 2022 hearing regarding National
 4 Fire's pending motion to continue all discovery deadlines (ECF No. 59) and the pending
 5 motions for protective order regarding the depositions of Martin Shives (ECF No. 57),
 6 Scott Thomas (ECF No. 67), and Mark VonderHaar (ECF No. 69). If the Court grants
 7 the motion to continue discovery or the motions for protective order, the parties will set
 8 new expert disclosure dates; if not, the parties will move forward with the expert
 9 disclosure date of January 6, 2023 granted by this stipulation.

10 In accordance with LR IA 6-1, there has been one prior extension solely to extend
 11 the initial expert disclosure dates (ECF No. 76). The extension is necessary due to the
 12 fact the hearings have been moved per ECF 79. There have been five prior stipulations
 13 for the extension of time regarding discovery deadlines. (ECF No. 52)

14 **IT IS SO STIPULATED.**

15 Dated: December 13, 2022

NICOLAIDES FINK THORPE
 MICHAELIDES SULLIVAN LLP

17 By: /s/ Jeffrey N. Labovitch
 18 Jeffrey N. Labovitch
 19 Dawn A. Hove
 20 Attorneys for Defendant, Counterclaimant
 21 and Third-Party Plaintiff National
 Fire & Marine Insurance Company

22 Dated: December 13, 2022

SHIVES & ASSOCIATES LIMITED

24 By: /s/ Martin L. Shives
 25 Martin L. Shives
 26 Attorneys for Defendant, Counterclaimant
 27 and Third-Party Plaintiff National
 28 Fire & Marine Insurance Company

1 Dated: December 13, 2022

BROWN, BONN & FRIEDMAN, LLP

2
3 By: /s/ Thomas Friedman
Thomas Friedman
4 Attorneys for Defendant, Counterclaimant
5 and Third-Party Plaintiff National
Fire & Marine Insurance Company

6 Dated: December 13, 2022

PAYNE & FEARS LLP

7
8 By: /s/ Scott S. Thomas
Scott S. Thomas
9 Sarah J. Odia
10 Attorneys for Plaintiff and Counter-
Defendant PN II, Inc. dba Pulte Homes
11 and/or Del Webb

12 Dated: December 13, 2022

MRV LAW, INC.

13
14 By: /s/ Mark R. VonderHaar
Mark R. VonderHaar
15 Attorneys for Third-Party Defendants
16 Contractors Insurance Company of North
America

17 Dated: December 13, 2022

LEE LANDRUM & INGLE, APC

18
19 By: /s/ Natasha Landrum
Natasha Landrum
20 Attorneys for Third-Party Defendants
21 Contractors Insurance Company of North
America

22
23 **STATEMENT OF AUTHORITY TO FILE**

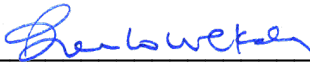
24 I attest that all signatories on this document and on whose behalf the filing is
25 submitted concur in the filing's content and have authorize the filing of this document.

26
27 By: /s/ Jeffrey N. Labovitch
Jeffrey N. Labovitch
28

ORDER

IT IS SO ORDERED. All parties have until January 6, 2023, for initial expert disclosures.

DATED: December 14, 2022


UNITED STATES MAGISTRATE JUDGE